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Gregory A. Brower (Nevada Bar No. 5232)
 Patrick G. Byrne (Nevada Bar No. 7636)
 Justin L. Carley (Nevada Bar No. 9994)
 Claire Y. Dossier (Nevada Bar No. 10030)
 SNELL & WILMER L.L.P.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
 Telephone: (702) 784-5200
 Facsimile: (702) 784-5252
 Email: gbrower@swlaw.com
 pbyrne@swlaw.com
 jcarley@swlaw.com
 cdossier@swlaw.com

Marc E. Kasowitz, Esq.
 Andrew K. Glenn, Esq.
 Trevor J. Welch, Esq.
 KASOWITZ, BENSON, TORRES &
 FRIEDMAN LLP
 1633 Broadway
 New York, NY 10019-6799
 Telephone: (212) 506-1700
 Facsimile: (212) 506-1800
 Email: MKasowitz@kasowitz.com
 AGlenn@kasowitz.com
 TWelch@kasowitz.com
Pro Hac Vice Pending

Attorneys for GCR Gaming, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

Case No. 10-50381-gwz

GV RANCH STATION, INC.,

Chapter 11

Debtor.

**EX PARTE APPLICATION TO EXCEED
 PAGE LIMIT PURSUANT TO LOCAL
 RULE 9014(e) RE MOTION (1) TO
 DISMISS CHAPTER 11 CASE, OR, IN
 THE ALTERNATIVE, (2) TO COMPEL
 REJECTION OF OPERATING
 AGREEMENT OR (3) FOR RELIEF
 FROM THE AUTOMATIC STAY TO
 EXERCISE APPLICABLE NON-
 BANKRUPTCY RIGHTS**

TO THE HONORABLE GREGG W. ZIVE:

Pursuant to LR 9014(e)(1), GCR Gaming, LLC ("GCR"), by and through its attorneys SNELL & WILMER L.L.P. and KASOWITZ, BENSON, TORRES & FRIEDMAN LLP, hereby submit its *Ex Parte Application to Exceed Page Limit Pursuant to Local Rule 9014(e)* (the "Application") regarding *GCR Gaming's Motion (1) to Dismiss Chapter 11 Case or, in the Alternative, (2) to Compel Rejection of Operating Agreement, or (3) for Relief from the Automatic Stay to Exercise Applicable Non-Bankruptcy Rights* (the "Motion"), because the Motion exceeds the twenty (20) page limit for pleadings. In support of the Application, GCR respectfully represents as follows:

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1 1. On February 10, 2010, GVR Ranch Station, Inc. (the “Debtor”) filed a voluntary
2 petition for relief under Chapter 11 of the Bankruptcy Code in this Court (the “GVR Chapter
3 11 Case”). [GVR Station Docket No. 1]. The Debtor’s Chapter 11 petition lists only three
4 creditors -- all of which are Station Casinos, Inc. (“Station Casinos”) affiliates -- with
5 unspecified amounts. [GVR Station Docket No. 3].

6 2. Previously, on July 28, 2009, Station Casinos and 17 of its affiliates filed
7 voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Main Station
8 Debtors”). [Main Station Case Docket No. 1]. The Main Station Debtors’ cases are currently
9 being jointly administered pursuant to a joint administration order dated July 30, 2009 [Main
10 Station Case Docket No. 7] under main case number 09-52477 in the United States Bankruptcy
11 Court for the District of Nevada (the “Main Station Case”).

12 3. The GVR Chapter 11 Case is currently not being jointly administered with the
13 Main Station Case and no pleadings have been filed in the GVR Chapter 11 Case.

14 4. The Motion seeks relief based on GCR’s allegations that Debtor flagrantly and
15 continuously breached its contractual and fiduciary duties to its joint venture partner, GCR, as
16 manager of the Green Valley Ranch Las Vegas luxury resort and casino in Henderson, Nevada
17 (the “Green Valley Ranch”), and improperly attempted to forestall the consequences of its
18 wrongdoing through the bad-faith filing of its Chapter 11 petition in this Court.

19 5. GCR and the Debtor each own a 50% equity interest in Green Valley Ranch
20 Gaming, LLC (“GVR LLC”), which owns the Green Valley Ranch resort and casino. GCR’s and
21 the Debtor’s rights and obligations in connection with GVR LLC are embodied in that certain
22 Operating Agreement, by and among GCR, Debtor, and GVR LLC, dated March 10, 2000 (the
23 “Operating Agreement”).

24 6. GCR is seeking through its Motion to dismiss the GVR Chapter 11 Case, or, in the
25 alternative, to compel rejection of the Operating Agreement, or relief from the automatic stay to
26 exercise certain of its rights under non-bankruptcy law.

27 7. While GCR could have pursued these three requests for relief through the filing of
28 three separate motions that were twenty pages or less, the supporting facts and arguments for each

are highly overlapping and interrelated. As a result, the Motion is currently approximately 26 pages, and GCR has included a Table of Contents and Table of Authorities in the Motion. GCR respectfully submits that it is in the best interests of all parties that the Court reviews GCR's arguments together in one comprehensive and unified Motion, rather than review them in three separate yet highly similar and likely repetitive motions.

WHEREFORE GCR respectfully requests that the Court enter an order, substantially in the form as the proposed order attached hereto as Exhibit "A", granting GCR leave pursuant to Local Rule 9014(e) to file the Motion in excess of the normal page limits, without an index, and granting such other and further relief as is just and proper.

DATED this 18th day of February, 2010.

SNELL & WILMER L.L.P.

By: 

Gregory A. Brower (Nevada Bar No. 5232)
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3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

Marc E. Kasowitz, Esq.
Andrew K. Glenn, Esq.
Trevor J. Welch, Esq.
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
1633 Broadway
New York, NY 10019-6799
Telephone: (212) 506-1700
Facsimile: (212) 506-1800
Pro Hac Vice Pending

Attorneys for GCR Gaming, LLC

Snell & Wilmer

LLP
LAW OFFICES
3883 HOWARD HUGHES PARKWAY, SUITE 1100
LAS VEGAS, NEVADA 89169
(702)784-5200

EXHIBIT A

EXHIBIT A

Gregory A. Brower (Nevada Bar No. 5232)
Patrick G. Byrne (Nevada Bar No. 7636)
Justin L. Carley (Nevada Bar No. 9994)
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SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: gbrower@swlaw.com
pbyrne@swlaw.com
jcarley@swlaw.com
cdossier@swlaw.com

Marc E. Kasowitz, Esq.
Andrew K. Glenn, Esq.
Trevor J. Welch, Esq.
**KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP**
1633 Broadway
New York, NY 10019-6799
Telephone: (212) 506-1700
Facsimile: (212) 506-1800
Email: MKasowitz@kasowitz.com
AGlenn@kasowitz.com
TWelch@kasowitz.com
Pro Hac Vice Pending

Attorneys for GCR Gaming, LLC

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**ORDER GRANTING EX PARTE
APPLICATION TO EXCEED PAGE
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BANKRUPTCY RIGHTS**

GCR Gaming, LLC ("GCR"), by and through its attorneys SNELL & WILMER L.L.P.
and KASOWITZ, BENSON, TORRES & FRIEDMAN LLP, filed its *Ex Parte Application to
Exceed Page Limited Pursuant to Local Rule 9014(e)* ("Application") requesting leave of Court to

1 file GCR's Motion (1) to Dismiss Chapter 11 Case or, in the Alternative, (2) to Compel Rejection of
2 Operating Agreement, or (3) for Relief from the Automatic Stay to Exercise Applicable Non-
3 Bankruptcy Rights ("Motion") in excess of the twenty (20) page limit for pleadings pursuant to Local
4 Rule 9014(e). The Court, having reviewed and considered the Application, and with good cause
5 appearing therefore:

6 **IT IS HEREBY ORDERED** that the Application is GRANTED,

7 **IT IS FURTHER ORDERED** that GCR may file its Motion in excess of the page limits in
8 Local Rule 9014(e) without an index; provided, however, that the Motion otherwise complies with
9 the Court's local rules of practice and procedure.

10 **IT IS SO ORDERED.**

11 Prepared and respectfully submitted by:

12 SNELL & WILMER L.L.P.

13 By: _____
14 Gregory A. Brower (Nevada Bar No. 5232)
15 Patrick G. Byrne (Nevada Bar No. 7636)
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26 1633 Broadway
27 New York, NY 6-1700
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Attorneys for GCR Gaming, LLC

###

Snell & Wilmer

L.L.P.
LAW OFFICES
3883 HOWARD HUGHES PARKWAY, SUITE 1100
LAS VEGAS, NEVADA 89169
(702) 784-5200